

EXHIBIT “B”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

THOMAS E. WHATLEY III,
Plaintiff

v.

CREDITWATCH SERVICES, LTD.,
Defendant.

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Civil Action No. 4:11-cv-00493-RAS-DDB

DECLARATION OF MARSHALL MEYERS

I, Marshall Meyers, state as follows:

1. I am one of Plaintiff's attorneys in this case, and have knowledge of its facts. I make this declaration based on my personal knowledge.
2. I am a founding and managing partner of Weisberg & Meyers, LLC.
3. I have reviewed the itemized time entries included in W&M's Statement of Services.
4. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's file.
5. Each of these time entries truly and accurately reflects the services I performed in this case.
6. Each time entry was entered contemporaneously to the task being completed into our computer database, Amicus Attorney.
7. The time I incurred on each time entry was reasonable and necessary.
8. I have reviewed my biographical section of Plaintiff's Motion for Attorneys' Fees and it truly and accurately reflects my background and experience.
9. I expended a total of 41.6 billable hours in this matter. In the exercise of billing discretion, other time entries have been waived. My contemporaneously kept records reflecting our services in this litigation are attached to Plaintiff's Motion for Attorneys' Fees as Exhibit A.
10. I have been practicing consumer protection law exclusively for over 10 years, and the reasonable hourly rate for my services is \$335.00 per hour.

11. The lodestar calculation of attorney's fees for my time expended is (41.6 hours x \$335.00 per hour) \$13,936.00.
12. Armando Nava worked at Weisberg & Meyers, LLC as an associate attorney, but has since amicably left the firm. The reasonable hourly rate for his services at the time they were performed was \$175.00 per hour. Mr. Nava's contemporaneously kept records reflect that he spent 1.4 hours performing a preliminary client interview and evidence review. The lodestar calculation of attorney's fees for Mr. Nava's time expended is (1.4 hours x \$175.00 per hour) \$245.00.
13. I certify under penalty of perjury that the statements set forth in this declaration are true and correct.

Executed on: June 21, 2013.

By: s/ Marshall Meyers
Marshall Meyers

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
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THOMAS E. WHATLEY III,
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Civil Action No. 4:11-cv-00493-RAS-DDB

DECLARATION OF ALEX WEISBERG

I, Alex Weisberg, state as follows:

1. I am an attorney with Weisberg & Meyers. I worked on this case at the request of, and in conjunction with, Marshall Meyers and Noah Radbil. I make this declaration based on my personal knowledge.
2. I am a founding partner of Weisberg & Meyers, LLC.
3. I have reviewed the itemized time entries included in W&M's Statement of Services.
4. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's file.
5. Each of these time entries truly and accurately reflects the services I performed in this case.
6. Each time entry was entered contemporaneously to the task being completed into our computer database, Amicus Attorney.
7. The time I incurred on each time entry was reasonable and necessary.
8. I have reviewed my biographical section of Plaintiff's Motion for Attorneys' Fees and it truly and accurately reflects my background and experience.
9. I expended a total of 1.1 hours in this matter performing preliminary research and to speak with the client personally. My contemporaneously kept records reflecting our services in this litigation are attached to Plaintiff's Motion for Attorneys' Fees as Exhibit A.
10. The reasonable hourly rate for my services is \$335.00 per hour.

11. The lodestar calculation of attorney's fees for my time expended is (1.1 hours x \$335.00 per hour) \$368.50.

12. I certify under penalty of perjury that the statements set forth in this declaration are true and correct.

Executed on: June 21, 2013.

By: s/ Alex Weisberg
Alex Weisberg

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
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THOMAS E. WHATLEY III,
Plaintiff

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Civil Action No. 4:11-cv-00493-RAS-DDB

DECLARATION OF NOAH RADBIL

I, Noah Radbil, state as follows:

1. I am one of Plaintiff's attorneys in this case, and have knowledge of its facts. I make this declaration based on my personal knowledge.
2. I am an associate attorney at Weisberg & Meyers, LLC.
3. I have reviewed the itemized time entries included in W&M's Statement of Services.
4. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's file.
5. Each of these time entries truly and accurately reflects the services I performed in this case.
6. Each time entry was entered contemporaneously to the task being completed into our computer database, Amicus Attorney.
7. The time I incurred on each time entry was reasonable and necessary.
8. I have reviewed my biographical section of Plaintiff's Motion for Attorneys' Fees and it truly and accurately reflects my background and experience.
9. I expended a total of 144.6 billable hours in this matter. In the exercise of billing discretion, other time entries have been waived. My contemporaneously kept records reflecting our services in this litigation are attached to Plaintiff's Motion for Attorneys' Fees as Exhibit A.
10. The reasonable hourly rate for my services is \$230.00 per hour.
11. The lodestar calculation of attorney's fees for my time expended is (144.6 hours x \$230.00 per hour) \$33,258.00.

12. I certify under penalty of perjury that the statements set forth in this declaration are true and correct.

Executed on: June 21, 2013.

By: s/ Noah Radbil
Noah Radbil

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
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THOMAS E. WHATLEY III,
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Civil Action No. 4:11-cv-00493-RAS-DDB

DECLARATION OF DENNIS KURZ

I, Dennis Kurz, state as follows:

1. I was one of Plaintiff's attorneys in this case, and have knowledge of its facts for the time I worked on it. I make this declaration based on my personal knowledge.
2. I am a former senior associate attorney at Weisberg & Meyers, LLC.
3. I have reviewed the itemized time entries included in W&M's Statement of Services.
4. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's file.
5. Each of these time entries truly and accurately reflects the services I performed in this case.
6. Each time entry was entered contemporaneously to the task being completed into our computer database, Amicus Attorney.
7. The time I incurred on each time entry was reasonable and necessary.
8. I have reviewed my biographical section of Plaintiff's Motion for Attorneys' Fees and it truly and accurately reflects my background and experience.
9. I expended a total of 21.3 billable hours in this matter. In the exercise of billing discretion, other time entries have been waived. My contemporaneously kept records reflecting our services in this litigation are attached to Plaintiff's Motion for Attorneys' Fees as Exhibit A.
10. The reasonable hourly rate for my services is \$300.00 per hour.
11. The lodestar calculation of attorney's fees for my time expended is (21.3 hours x \$300.00 per hour) \$6,390.00.

12. I certify under penalty of perjury that the statements set forth in this declaration are true and correct.

Executed on: June 21, 2013.

By: s/ Dennis Kurz
Dennis Kurz

**IN THE UNITED STATES DISTRICT COURT
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THOMAS E. WHATLEY III,
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Civil Action No. 4:11-cv-00493-RAS-DDB

DECLARATION OF JOE PANVINI

I, Joe Panvini, state as follows:

1. I am one of Plaintiff's attorneys in this case, and have knowledge of its facts. I make this declaration based on my personal knowledge.
2. I am an associate attorney at Weisberg & Meyers, LLC.
3. I have reviewed the itemized time entries included in W&M's Statement of Services.
4. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's file.
5. Each of these time entries truly and accurately reflects the services I performed in this case.
6. Each time entry was entered contemporaneously to the task being completed into our computer database, Amicus Attorney.
7. The time I incurred on each time entry was reasonable and necessary.
8. I have reviewed my biographical section of Plaintiff's Motion for Attorneys' Fees and it truly and accurately reflects my background and experience.
9. I expended a total of 84.3 billable hours in this matter. In the exercise of billing discretion, other time entries have been waived. My contemporaneously kept records reflecting our services in this litigation are attached to Plaintiff's Motion for Attorneys' Fees as Exhibit A.
10. The reasonable hourly rate for my services is \$175.00 per hour.
11. The lodestar calculation of attorney's fees for my time expended is (144.6 hours x \$175.00 per hour) \$14,752.50.

12. I certify under penalty of perjury that the statements set forth in this declaration are true and correct.

Executed on: June 21, 2013.

By: s/ Joe Panvini
Joe Panvini

**IN THE UNITED STATES DISTRICT COURT
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THOMAS E. WHATLEY III,
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CREDITWATCH SERVICES, LTD.,
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Civil Action No. 4:11-cv-00493-RAS-DDB

DECLARATION OF AARON RADBIL

I, Aaron Radbil, state as follows:

1. I am an attorney with Weisberg & Meyers. I worked on this case at the request of, and in conjunction with, Marshall Meyers and Noah Radbil. I make this declaration based on my personal knowledge.
2. I am a partner at Weisberg & Meyers, LLC, and am, among other job duties, responsible for overseeing the quality of work product presented in litigation.
3. I have reviewed the itemized time entries included in W&M's Statement of Services.
4. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's file.
5. Each of these time entries truly and accurately reflects the services I performed in this case.
6. Each time entry was entered contemporaneously to the task being completed into our computer database, Amicus Attorney.
7. The time I incurred on each time entry was reasonable and necessary.
8. I have reviewed my biographical section of Plaintiff's Motion for Attorneys' Fees and it truly and accurately reflects my background and experience.
9. I expended a total of 6.1 billable hours in this matter. In the exercise of billing discretion, other time entries have been waived. My contemporaneously kept records reflecting our services in this litigation are attached to Plaintiff's Motion for Attorneys' Fees as Exhibit A.
10. The reasonable hourly rate for my services in this case is \$335.00 per hour.

11. The lodestar calculation of attorney's fees for my time expended is (6.1 hours x \$335.00 per hour) \$2,043.50.

12. I certify under penalty of perjury that the statements set forth in this declaration are true and correct.

Executed on: June 21, 2013.

By: s/ Aaron Radbil
Aaron Radbil

**IN THE UNITED STATES DISTRICT COURT
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THOMAS E. WHATLEY III,
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Civil Action No. 4:11-cv-00493-RAS-DDB

DECLARATION OF RUSSELL S. THOMPSON IV

I, Russell S. Thompson IV, state as follows:

1. I was one of Plaintiff's attorneys in this case, and have knowledge of its facts for the time I worked on it. I make this declaration based on my personal knowledge.
2. I am a former associate attorney at Weisberg & Meyers, LLC.
3. I have reviewed the itemized time entries included in W&M's Statement of Services.
4. The time entries bearing my name represent the actual attorney hours I spent working on Plaintiff's file.
5. Each of these time entries truly and accurately reflects the services I performed in this case.
6. Each time entry was entered contemporaneously to the task being completed into our computer database, Amicus Attorney.
7. The time I incurred on each time entry was reasonable and necessary.
8. I have reviewed my biographical section of Plaintiff's Motion for Attorneys' Fees and it truly and accurately reflects my background and experience.
9. I expended a total of 17.1 billable hours in this matter. In the exercise of billing discretion, other time entries have been waived. My contemporaneously kept records reflecting our services in this litigation are attached to Plaintiff's Motion for Attorneys' Fees as Exhibit A.
10. The reasonable hourly rate for my services is \$175.00 per hour.
11. The lodestar calculation of attorney's fees for my time expended is (17.1 hours x \$175.00 per hour) \$2,992.50.

12. I certify under penalty of perjury that the statements set forth in this declaration are true and correct.

Executed on: June 21, 2013.

By: s/ Russell S. Thompson IV
Russell S. Thompson IV